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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARILYN O’CONNOR,
Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,
Defendant.

) Case No.: 3:21-cv-00488-CSD

) **UNOPPOSED MOTION FOR**
) **EXTENSION OF TIME**
) **(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by and through her undersigned attorneys, hereby moves for a 60-day extension of time to file Defendant’s Electronic Certified Administrative Record and Answer to Plaintiff’s Complaint. Defendant’s Electronic Certified Administrative Record and Answer to Plaintiff’s Complaint are due to be filed by May 31, 2022. Counsel for Defendant attempted to contact Plaintiff this morning but without success, and cannot state whether Plaintiff opposes this motion.

Defendant makes this request in good faith and with no intention to delay proceedings unnecessarily. Social Security Administration’s Office of Appellate Operations (OAO) staff does not

1 anticipate being able to complete this assembly by the current due date. Given this, Defendant
2 respectfully requests an extension of 60 days in which to file the Answer, changing the due date from
3 May 31, 2022, to August 1, 2022. Defendant apologizes to the Court and to Plaintiff for any
4 inconvenience caused by this delay.

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6 Dated: May 31, 2022

Respectfully submitted,

7 JASON M. FRIERSON
8 United States Attorney

9 /s/ Daniel P. Talbert
10 DANIEL P. TALBERT
11 Special Assistant United States Attorney

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13 IT IS SO ORDERED:

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15 HON. CRAIG S. DENNEY
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: June 1, 2022
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